

## STATE OF WASHINGTON DEPARTMENT OF ECOLOGY

1315 W. 4th Avenue • Kennewick, Washington 99336-6018 • (509) 735-7581

June 4, 2003

Mr. James E. Rasmussen, Director Environmental Division Office of River Protection United States Department of Energy P.O. Box 450, MSIN: H6-60 Richland, Washington 99352



**EDMC** 

Dear Mr. Rasmussen:

Re: Response to Request for Deferral of the Annual Integrity Assessment for Sl-117, A Direct Buried Transfer Line

The Washington State Department of Ecology (Ecology) received your request for deferral of the annual integrity assessment of the direct buried transfer line, SL-117, dated May 27, 2003. Upon receiving the request, I authorized the deferral, verbally and via e-mail, to Phil Miller of CH2M HILL Hanford Group, Inc.

Ecology authorizes this deferral under the following conditions:

- 1. The integrity assessment for this direct-buried transfer line will be conducted by October 1, 2003, and the results sent to Ecology by October 10, 2003.
- 2. Data on the tests conducted during the transfer of waste from 241-SX-102 to verify the integrity of the transfer line, including soil radiation survey every 12 hours and the calculated material balance discrepancy between 241-SX-101 and 241-SY-102 every six hours, is available to confirm this line maintained its integrity over the last year.
- 3. This deferral is given to allow for continuing the interim stabilization efforts to meet the consent decree deadline for September 30, 2003, requiring only 2% pumpable liquid remaining in the unstabilized single-shelled tanks.
- 4. Deferrals such as this do not set precedent for such activities in the tank farms.

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Ecology reminds you that such annual tank integrity assessments are required for the operation of non-compliant lines and are scheduled tests. Requests of this nature should be more timely. Ecology is concerned that despite your urgency for continuous use of this transfer line to support interim stabilization activities, Ecology's approval for continued use of this line did not reach the field crew and the transfer of waste was stopped. Ecology expects that pumping has restarted.

Please notify Ecology when this integrity assessment will be conducted in the field. If this integrity assessment is not completed and results available to Ecology by October 10, 2003, then this non-compliance becomes subject to enforcement effective from the day the line became subject to testing.

Sincerely,

Jeffery L. Lyon

Tank Waste Storage Project Manager

**Nuclear Waste Program** 

JL:NU:lkd

cc: William Dixon, CHG
Sandra Fowler, CHG
Moussa Jarayssi, CHG
Felix Miera, CHG
Phil Miller, CHG
Todd Martin, HAB
Rick Gay, CTUIR
Pat Sobotta, NPT
Russell Jim, YN

Ken Niles, OOE
Administrative Record